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9 *Attorneys for Defendant Bank of America, N.A.*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 RICHARD ZEITLIN, ADVANCED  
 TELEPHONY CONSULTANTS, MRZ  
 MANAGEMENT, LLC, DONOR  
 RELATIONS, LLC, TPFE, INC., AMERICAN  
 TECHNOLOGY SERVICES, COMPLIANCE  
 CONSULTANTS, CHROME BUILDERS  
 CONSTRUCTION, INC., and UNIFIED  
 16 DATA SERVICES,

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO  
 EXTEND TIME TO PRODUCE  
 DOCUMENTS IN RESPONSE TO  
 COURT'S ORDER PARTIALLY  
 GRANTING PLAINTIFFS' MOTION TO  
 COMPEL, ECF NO. 257**

**(FIRST REQUEST)**

17 Plaintiffs,

18 v.  
 19 BANK OF AMERICA, N.A., and JOHN and  
 JANE DOES 1-100,

20 Defendants.

22 Plaintiffs Richard Zeitlin; Advanced Telephony Consultants; MRZ Management, LLC;  
 23 Donor Relations, LLC; TPFE, Inc.; American Technology Services; Compliance Consultants;  
 24 Chrome Builders Construction, Inc.; and Unified Data Services (the "Plaintiffs") and Defendant  
 25 Bank of America, N.A. ("BANA"), by and through their respective undersigned counsel of record,  
 26 submit this Stipulation and Proposed Order for a 1-week extension of BANA's deadline to  
 27 produce certain documents in response to this Court's Order partially granting Plaintiffs' Motion

1 to Compel (ECF No. 257) (the “Order”). This is the Parties’ first request for an extension of the  
 2 production deadline for the Order and is not intended to cause any delay or prejudice to any party.

3       The Order was filed on October 3, 2022, and ordered BANA to produce certain  
 4 documents within 30 days. (ECF No. 257 at 4:12.) The Parties request an extension from  
 5 November 2, 2022, BANA’s current deadline to produce documents, to November 9, 2022.

6       The reason for the extension is to give the Parties time to discuss their understanding of  
 7 the Order as Plaintiffs’ counsel just recently returned from an overseas trip.

8       IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time  
 9 for BANA to produce documents pursuant to the Order is extended to and through November 9,  
 10 2022.

11 **IT IS SO STIPULATED.**

12 Dated: October 27, 2022

Dated: October 27, 2022

13 THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

14       /s/ Robert G. Bernhoft  
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21 **IT IS SO ORDERED.**



22 UNITED STATES MAGISTRATE JUDGE

23       October 28, 2022  
 24 DATED: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO PRODUCE DOCUMENTS IN RESPONSE TO COURT'S ORDER PARTIALLY GRANTING PLAINTIFFS' MOTION TO COMPEL, ECF NO. 257 (FIRST REQUEST)** with the Clerk of the Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: October 27, 2022

/s/ Maricris Williams  
An Employee of Snell & Wilmer L.L.P.

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